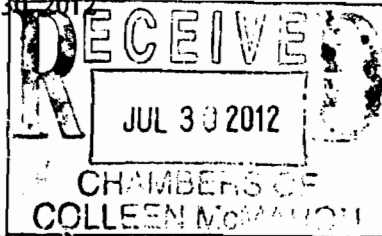


590 Madison Avenue, 20th Floor, New York, NY 10022-2524 • p212 223-4000 • f212 223-4134

crowell & moring

July 30, 2012



VIA FACSIMILE

Honorable Colleen McMahon
United States District Judge
U.S. District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007-1312

MEMO ENDORSED

**Re: Medien Patent Verwaltung AG v. Warner Bros. Entertainment, Inc., et al.
Civil Action No.: 1:10-cv-04119-CM**

Dear Judge McMahon:

In accordance with the Court's endorsement, dated July 10, 2012 (Dkt. No. 87), Plaintiff Medien Patent Verwaltung AG and defendants Warner Bros. Entertainment, Inc., Technicolor Inc. (collectively "WB/Technicolor") and Deluxe Entertainment Services Group, Inc., through their undersigned counsel, hereby submit the attached Joint Proposed Case Schedule for consideration and approval by the Court.

Respectfully submitted:

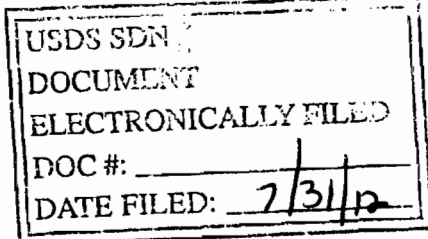
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7/31/2012

*The schedule is fine through
Item 9. After that,
we will contact you.*



Honorable Colleen McMahon
July 30, 2012
Page 2

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Attachment

Medien Patent Verwaltung AG v. Warner Bros. Entertainment, Inc., et al.
Case No.: 10-cv-04119-CM

JOINT PROPOSED CASE SCHEDULE

Event		Proposed Schedule
1	Deadline to Amend Pleadings	September 14, 2012
2	Deadline to Add Parties	September 14, 2012
3	Close of Fact Discovery	November 28, 2012
4	Deadline for Parties to serve Opening Expert Reports on issues for which they bear the burden of proof	December 11, 2012
5	Deadline for Parties to serve Rebuttal Expert Reports	December 21, 2012
6	Close of Expert Discovery	December 31, 2012
7	Deadline to file any <i>Daubert</i> motions	January 14, 2013
8	Deadline to file any dispositive motions	January 31, 2013
9	Joint Pre-Trial Statement due (including action, factual basis for action, disputed legal issues, joint set of jury instructions, exchange of exhibits, deposition designations, etc.)	March 21, 2013
10	Deadline to file any motions <i>in limine</i> and objections to evidence/exhibits	April 1, 2013
11	Deadline to file a response to any motions <i>in limine</i> and objections to evidence/exhibits	April 11, 2013
12	Pre-Trial Conference (subject to Court calendar)	April 16, 2013
13	Trial ready date or 30 days after denial of dispositive motions (subject to Court calendar)	April 29, 2013 ¹

¹ WB/Technicolor counsel is currently set for a May trial term beginning May 6, 2013 in the Middle District of Florida.